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September 29, 2023

BY ECF

Hon. Paul A. Crotty, Jr.  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

10/2/2023  
The request ☒ is granted  
Sondra  
Paul H. Crotty  
JSDP

Re: *United States v Angelo Palencia*, 23 Cr. 257 (PAC)

Dear Judge Crotty:

I write to respectfully request that the Court order the authorities at the Metropolitan Detention Center ("MDC") to provide Mr. Palencia private access to his discovery for at least five hours per week in the law library or the area in the visiting room designated for discovery review until the date of the scheduled status conference on November 15, 2023.

Mr. Palencia has been detained at the MDC since March 23, 2023. The government provided him with a hard drive containing discovery in late July 2023, but because MDC is in a perpetual state of lockdown, Mr. Palencia has only a handful of opportunities to review his discovery. Furthermore, on the rare occasion that he is able to review his discovery, he only has access to two computers located on his unit. These two computers are shared by approximately 120 inmates and are in the public space of the housing unit that offers no privacy. Mr. Palencia reports that other inmates can easily, and do, view his discovery when he is at the computer.

Mr. Palencia's ability to thoroughly and meaningfully review his discovery and assist in his own defense is being severely compromised by the unacceptable conditions of his confinement.

Therefore, I respectfully request that the Court grant this application and direct the MDC to provide Mr. Palencia private access to his discovery for at least five hours per week until the date of November 15, 2023.

Respectfully submitted,

/s/ Amy Gallicchio

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